

Hamilton County Municipal Court, Cincinnati, Ohio
Small Claims Complaint

ABDEL G. OULD SIYAM

1610 King of Arms Ct., Apt. E

Louisville, KY. 40222-4331

Plaintiff(s)

Phone Number

Case No. 12 CV 23047

In accordance with civil rule 4.6 (C) or (D) and
 4.6 (E), an ordinary mail waiver is requested

VS.

Amount \$ 3,000.00

Firstsource Advantage, LLC, c/o Statutory Agent

CT Corporation Systems, 111 Eight Avenue

New York, New York 10011

Defendant(s)

Plaintiff says that there is due and owing from the defendant(s) the sum of

Three Thousand

00/100

For the following reason(s):

See Attached.



D98966186

CLERK'S OFFICE
HAMILTON COUNTY, OH
JULY 15, 2012
CERT. MAIL

Interest, if applicable, from the _____ day of _____ plus Court Costs.

ATTENTION: ALLOW SUFFICIENT TIME TO ENTER THE COURTHOUSE DUE TO SECURITY CHECK. DELAYS POSSIBLE.

Notice and summons in action for money only

To: (1) Firstsource Advantage, LLC, c/o Statutory Agent

(2) _____

C.T. Corporation System, 111 Eight Avenue

New York, N.Y. 10011

Notice to the Defendant: The court will hold trial on this claim at the Hamilton County Courthouse, 1000 Main St., Rm. 265 at 9:00 A.M., on:

9-28-12

If you do not appear at the trial, judgment may be entered against you by default, and your earnings may be subject to garnishment, or your property may be attached to satisfy the judgment. If your defense is supported by witnesses, account books, receipts, or other documentation, you must produce them at the trial. Subpoenas for witnesses, if necessary, should be filed with the clerk at least seven (7) days before the trial. If you believe you have a claim against the plaintiff, you must file a counterclaim with the court and must serve the plaintiff and all other parties with a copy of the counterclaim at least seven (7) days prior to the trial date of the plaintiff's claim. All filings to be filed/mailed with the appropriate fees to: Hamilton County Clerk of Courts 1000 Main St. Rm. 115, Cincinnati, Ohio 45202. If you admit the claim but desire time to pay, you may make such a request at the trial.

Memorandum to the Plaintiff

Bring your evidence and witnesses, if any, with you. Subpoenas for witnesses, if necessary, must be filed with the clerk at least seven (7) days before the trial date. On accident cases involving a motor vehicle, you must bring your title to the vehicle.

Plaintiff further states that to the best of their knowledge the defendant is / is not a member of the Armed Forces of the United States of America.

Signature of Plaintiff/Attorney

Attorney Address Only

513-929-4040 * 0067285

Phone No.

Attorney ID No.



scribed and sworn to before me this 23



FAY GLORIA WAH
 Notary Public, State of OHIO
 My Commission Expires April 27, 2015

HAMILTON COUNTY MUNICIPAL COURT
SMALL CLAIMS DIVISION
HAMILTON COUNTY, OHIO.

ABDEL G. OULD SIYAM : NO:
1610 King of Arms Ct., Apt. E :
Louisville, KY. 40222-4331 :
Plaintiff : (Judge _____)
v. :
FIRSTSOURCE ADVANTAGE, LLC :
c/o Statutory Agent :
C T Corporation System :
111 Eighth Avenue :
New York, N.Y. 10011 :
Defendants :

**COMPLAINT FOR STATUTORY DAMAGES UNDER THE FAIR DEBT
COLLECTION PRACTICES ACT, PURSUANT TO 15 U.S.C. §1692, ET SEQ
AND OHIO REVISED CODE §1319.12 ET SEQ**

Comes now the Plaintiff, by and through counsel, and hereby states for his claim as follows:

JURISDICTION AND VENUE

1. Pursuant to 15 U.S.C. 1692(h), §813(b)(2)(d) this action may be brought in any Court of competent jurisdiction.
2. Firstsource Advantage, LLC (hereinafter "Firstsource") is incorporated under the laws of the State of New York.

FACTS

3. Plaintiff allegedly received services from J.P. Morgan.
4. Firstsource alleged a debt by Plaintiff on said account.
5. J.P. Morgan employed a third party debt collector to collect said debt.

6. Said debt has been denied by Plaintiff.
7. J.P. Morgan employed Firstsource to collect said debt.
8. Firstsource contacted Plaintiff by mail with respect to said debt. (See attached Exhibit "A").
9. Plaintiff has retained counsel.
10. Within thirty (30) days of receiving the notification form from the third party debt collector, Plaintiff denied the debt.
11. Defendant, Firstsource was contacted by Plaintiff's counsel and was asked to forward proof of said debt. (See attached Exhibit "B", June 19, 2012 letter).
12. Defendant, Firstsource has failed to comply and, therefore, is in violation of 15 U.S.C. 1692 *et seq.*
13. Pursuant to 15 U.S.C. 1692(k) §813, Defendant is liable to Plaintiff for failing to verify the debt upon proper request.
14. Defendant, Firstsource, failed to include statutorily required language as required under 15 U.S.C. 1692, §809(g)(a)(4).
15. Defendant has made false or misleading representations in its initial communication with Plaintiff, Exhibit "A", in violation of 15 U.S.C. 1692, §807(2)(A).
16. Plaintiff has suffered damages and attorneys' fees.

WHEREFORE, Plaintiff requests statutory damages of \$3,000.00 from the Defendant, for attorneys' fees, court costs and for any and all other relief which this Court may deem just and appropriate.

Respectfully submitted,

McINTOSH & McINTOSH

By _____

A. Brian McIntosh
Reg. #0067295
Attorney for Plaintiff
1136 St. Gregory Street, Suite 100
Cincinnati, Ohio 45202
513-929-4040 (Telephone)
513-929-4070 (Fax)
Brian@McIntoshlaw.com

TO THE CLERK

Please, issue certified mail service of the Summons and Complaint on the Defendants at their last known addresses of:

FIRSTSOURCE ADVANTAGE, LLC :
c/o Statutory Agent
C T Corporation System :
111 Eighth Avenue
New York, N.Y. 10011
